



Samuel Heins, Esq.  
Bryan L. Crawford, Esq.  
Daniel E. Gustafson, Esq.  
**HEINS, MILLS & OLSON, P.C.**  
3550 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 338-4605  
Facsimile: (612) 338-4692

Marc H. Edelson, Esq.  
**HOFFMAN & EDELSON**  
45 West Court Street  
Doylestown, PA 18901  
Telephone: (215) 230-8043  
Facsimile: (215) 230-8735

Kenneth A. Wexler, Esq.  
Elizabeth Fegan Hartweg, Esq.  
**THE WEXLER FIRM**  
One North LaSalle Street, Suite 2000  
Chicago, IL 60602  
Telephone: (312) 346-2222  
Facsimile: (312) 346-0022

Eugene A. Spector, Esq.  
Jeffrey L. Kodroff, Esq.  
John A. Macoretta, Esq.  
**SPECTOR, ROSEMAN & KODROFF, P.C.**  
1818 Market Street, Suite 2500  
Philadelphia, PA 19103  
Telephone: (215) 496-0300  
Facsimile: (215) 496-6611

ON BEHALF OF DEFENDANTS

By /s/ Nicholas C. Theodorou  
Nicholas C. Theodorou, Esq. (BBO# 496730)  
Jessica Barnett, Esq. (BBO# 650535)  
**FOLEY HOAG, LLP**  
155 Seaport Boulevard  
Boston, MA 02210

DATED: March 1, 2006

D. Scott Wise, Esq. (admitted *pro hac vice*)  
Kimberley Harris, Esq. (admitted *pro hac vice*)

**DAVIS POLK & WARDWELL**

450 Lexington Avenue  
New York, NY 10017

Attorneys for Defendant AstraZeneca  
Pharmaceuticals LP

**CERTIFICATE OF SERVICE**

I hereby certify that I, Thomas M. Sobol, an attorney, caused a true and correct copy of the foregoing **Status Report** to be served on all counsel of record electronically on March 1, 2006 pursuant to Section D of Case Management Order No. 2.

/s/ Thomas M. Sobol

Thomas M. Sobol, Esq.

**HAGENS BERMAN SOBOL SHAPIRO LLP**

One Main Street, 4<sup>th</sup> Floor

Cambridge, MA 02142

Telephone: (617) 482-3700

Facsimile: (617) 482-3003

**MDL 1456 STATUS CHART – GOVERNMENT ENTITY CASES**

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Montana v. Abbott Labs., Inc. et al.	02-CV-12084-PBS	Removed to D. Mont.	<ul style="list-style-type: none"> <li>• December 7, 2005 – <b>Defendants’ Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents (re: Montana and Nevada)</b> <ul style="list-style-type: none"> <li>○ December 7, 2005 – Defendants’ Motion for Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</li> <li>○ December 8, 2005 – Opposition of the States of Nevada and Montana to Defendants’ Motion for Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</li> <li>○ December 12, 2005 – Defendants’ Motion for Leave to File Reply Memorandum in Support of Motion Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</li> <li>○ December 15, 2005 – Opposition of the States of Nevada and Montana to Defendants’ Motion for Leave to File Reply Memorandum in Support of Motion Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</li> <li>○ December 21, 2005 – Opposition of the States of Nevada and Montana to Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</li> <li>○ January 6, 2006 – Defendants’ Motion for Leave to File a Reply Brief in Support of Their Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</li> <li>○ January 6, 2006 – Defendants’ Reply Brief in Support of Their Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</li> <li>○ January 11, 2006 – Opposition of the States of Nevada and Montana to Defendants’ Motion for Leave to File a Reply Brief in Support of Their Emergency Motion for an Order Holding Plaintiffs in Contempt for Preservation of Potentially Relevant Documents</li> </ul> </li> </ul>

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
			<p>and for an Accounting of Spoliated Documents</p> <ul style="list-style-type: none"> <li>January 31, 2006 – <b>Defendants’ Motion to Compel Discovery from Plaintiffs State of Nevada And State of Montana</b> <ul style="list-style-type: none"> <li>February 14, 2006 – Opposition of the States of Nevada and Montana to Defendants’ Second Motion to Compel Discovery</li> </ul> </li> </ul>
<b>Nevada v. American Home Products, Inc. et al (“Nevada II”)</b>	02-CV-12086-PBS	Removed to D. Nev.	<ul style="list-style-type: none"> <li>December 7, 2005 – <b>Defendants’ Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents (re: Montana and Nevada, see entry under <i>Montana v. Abbott Labs., Inc. et al.</i>)</b></li> <li>January 31, 2006 – <b>Defendants’ Motion to Compel Discovery from Plaintiffs State of Nevada And State of Montana (see entry under <i>Montana v. Abbott Labs., Inc., et al.</i>)</b></li> </ul>
<b>California ex rel. Ven-A-Care of the Florida Keys, Inc. v. Abbott Labs., Inc. et al.</b>	03-CV-11226-PBS	Removed to C.D. Cal.	<ul style="list-style-type: none"> <li>August 25, 2005 – First Amended Complaint in Intervention for Money Damages and Civil Penalties for Violations of the California False Claims Act</li> <li>September 12, 2005 – <b>Relator Ven-A-Care’s Motion For Leave to File Under Seal Relator’s Notice of Election and Notice of Dismissal</b></li> <li>October 6, 2005 – <b>Motion for Entry of Joint Stipulation to Stay the Deadline for Defendant Abbott Laboratories Inc. to Respond to the First Amended Complaint in Intervention</b></li> <li>January 17, 2006 – <b>Defendants’ Motion to Dismiss the First Amended Complaint in Intervention</b> (<i>individual memoranda of law submitted by ZLB Behring LLC and Abbott Laboratories Inc.</i>) <ul style="list-style-type: none"> <li>January 17, 2006 – B. Braun of America Inc.’s Motion to Dismiss the State of California’s First Amended Complaint</li> <li>February 13, 2006 – Boehringer Ingelheim Pharmaceuticals, Inc.’s Motion to Dismiss and Joinder in Defendants’ Motion to Dismiss the First Amended Complaint-In-Intervention</li> </ul> </li> </ul>
<b>Illinois v. Abbott Laboratories, Inc., Case No. 05-C-4056;</b>  <b>Kentucky v. Abbott Laboratories, Inc., Case No. 3:05-CV-48;</b>  <b>Kentucky v. Warrick</b>	n/a	Removed to N.D. Ill.  Removed to E.D. Ky.  Removed to E.D.	<ul style="list-style-type: none"> <li>July 13, 2005 – Notices of Removal filed (based on <i>Grable &amp; Sons Metal Prods., Inc. v. Darue Eng’g &amp; Mfg.</i>, 125 S. Ct. 2363 (June 13, 2005))</li> </ul>

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
<b>Pharmaceuticals Corp., Case No. 05-CV-49;</b>  <b>Kentucky v. Alpharma Inc., Case No. 05-CV-47-KKC;</b>  <b>New York v. Aventis, Case No. 05-CV-873;</b>  <b>New York v. GlaxoSmithKline PLC, Case No. 05-CV-874;</b>  <b>New York v. Pharmacia Corp., Case No. 05-CV-872;</b>		Ky.  Removed to E.D. Ky.  Removed to N.D.N.Y.  Removed to N.D.N.Y.  Removed to N.D.N.Y.	
<b>Florida ex rel. Ven-A-Care of the Florida Keys v. Alpharma, Inc. et al., Case No. 05-257</b>		Removed to N.D. FL	<ul style="list-style-type: none"> <li>• <b>Motion to Remand in Florida v. Alpharma, Inc. (05-257)</b> filed but not briefed prior to transfer <ul style="list-style-type: none"> <li>○ September 16, 2005 – Plaintiffs’ Memorandum of Law in Support of Motion for Remand filed in D. Mass.</li> <li>○ October 14, 2005 – Defendants’ Memorandum of Law in Opposition to Plaintiffs’ Motion for Remand to State Circuit Court</li> <li>○ November 18, 2005 – Endorsed Request for International Judicial Assistance (Letter Rogatory)</li> </ul> </li> <li>• January 11, 2006 – Conditional Transfer Order transferring <i>State of Florida, et al. v. Mylan Laboratories, Inc., et al.</i>, N.D. Fla., C.A. No. 4:05-490 <ul style="list-style-type: none"> <li>○ January 26, 2006 – Notice of Opposition to proposed transfer filed by Florida Attorney General</li> <li>○ January 27, 2006 – Motion and Brief to Vacate the CTO must be received by JPML no later than February 10, 2006</li> </ul> </li> </ul>
<b>State of Arizona ex rel. v. Abbott Labs., Case No. 2:06-45</b>	n/a	D. Ariz.	<ul style="list-style-type: none"> <li>• January 30, 2006 – Conditional Transfer Order transferring <i>State of Arizona ex rel. v. Abbott Laboratories, Inc., et al.</i>, D. Ariz., Case No. 2:06-45 <ul style="list-style-type: none"> <li>○ February 13, 2006 – Notice of Opposition to proposed transfer filed by Arizona Attorney General</li> <li>○ February 22, 2006 – Motion and Brief to Vacate the CTO must be received by the JPML no later than March 1, 2006</li> </ul> </li> </ul>

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
			<ul style="list-style-type: none"> <li>February 27, 2006 – <b>Plaintiff's Motion to Vacate the CTO</b></li> </ul>
<b>County of Nassau v. Abbott Labs., Inc. et al.</b>	n/a	E.D.N.Y.	
<b>Consolidated County Case:</b> <b>City of New York</b> (S.D.N.Y.) <b>County of Albany</b> (N.D.N.Y.) <b>County of Allegany</b> (W.D.N.Y.) <b>County of Broome</b> (N.D.N.Y.) <b>County of Cattaraugus</b> (W.D.N.Y.) <b>County of Cayuga</b> (N.D.N.Y.) <b>County of Chautauqua</b> (W.D.N.Y.) <b>County of Chenango</b> (N.D.N.Y.) <b>County of Columbia</b> (N.D.N.Y.) <b>County of Cortland</b> (N.D.N.Y.) <b>County of Dutchess</b> (S.D.N.Y.) <b>County of Essex</b> (N.D.N.Y.) <b>County of Fulton</b> (N.D.N.Y.) <b>County of Genesee</b> (W.D.N.Y.) <b>County of Greene</b> (N.D.N.Y.) <b>County of Herkimer</b> (N.D.N.Y.) <b>County of Jefferson</b> (N.D.N.Y.) <b>County of Lewis</b> (N.D.N.Y.) <b>County of Madison</b> (N.D.N.Y.) <b>County of Monroe</b> (W.D.N.Y.) <b>County of Niagara</b> (N.D.N.Y.) <b>County of Oneida</b> (N.D.N.Y.) <b>County of Onondaga</b> (N.D.N.Y.) <b>County of Ontario</b> (W.D.N.Y.) <b>County of Orleans</b> (W.D.N.Y.) <b>County of Putnam</b> (S.D.N.Y.) <b>County of Rensselaer</b> (N.D.N.Y.) <b>County of Rockland</b> (S.D.N.Y.) <b>County of St. Lawrence</b>	n/a	E.D.N.Y. N.D.N.Y. S.D.N.Y. W.D.N.Y.	<ul style="list-style-type: none"> <li>March 30, 2005 – <b>County of Suffolk's Motion to Renew Its Second Motion to Compel the Production of Discovery From the Schering-Plough Corporation <i>sub judice</i></b> (Magistrate Judge Bowler) <ul style="list-style-type: none"> <li>April 6, 2005 – Schering Plough's Opposition to County of Suffolk's Motion to Renew Its Second Motion to Compel the Production of Discovery</li> </ul> </li> <li>June 15, 2005 – Redacted Consolidated Complaint filed in the United States District Court for the District of Massachusetts <ul style="list-style-type: none"> <li>June 15, 2005 – Plaintiffs' Motion for Leave to File Consolidated Complaint Under Seal</li> <li>June 22, 2005 – Corrected Consolidated Complaint filed in the United States District Court for the District of Massachusetts</li> <li>June 23, 2005 – Motion for Leave to File Consolidated Complaint Under Seal Denied. Defendants seeking redactions ordered to file affidavits within ten days.</li> <li>July 8, 2005 – Order modifying June 23, 2005 Order and extending time to file affidavits.</li> <li>October 4, 2005 – <b>Defendants' Request for Extension of Time and Further Relief in Order to Comply with July 8, 2005 Order</b></li> <li>February 8, 2006 – Motion by BMS for Extension of Time and Further Relief in Order to Comply with July 8, 2005 Order Denied</li> </ul> </li> </ul>

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
(N.D.N.Y.) <b>County of Saratoga</b> (N.D.N.Y.) <b>County of Schuyler</b> (W.D.N.Y.) <b>County of Seneca</b> (W.D.N.Y.) <b>County of Steuben</b> (W.D.N.Y.) <b>County of Suffolk</b> (E.D.N.Y.) <b>County of Tompkins</b> (N.D.N.Y.) <b>County of Warren</b> (N.D.N.Y.) <b>County of Washington</b> (N.D.N.Y.) <b>County of Wayne</b> (W.D.N.Y.) <b>County of Westchester</b> (S.D.N.Y.) <b>County of Yates</b> (W.D.N.Y.)			



**MDL 1456 STATUS CHART – PRIVATE CLASS CASES**

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action	Master File 01-CV-12257-PBS	D. Mass. pursuant to JPML Order	<ul style="list-style-type: none"> <li>May 3, 2004 – <b>Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period from Defendants Abbott Laboratories, AstraZeneca, Schering Plough, Sicor and Together Rx Defendants <i>sub judice</i></b> (Magistrate Judge Bowler) <ul style="list-style-type: none"> <li>May 17, 2004 – Certain Defendants’ Notice of Opposition to Plaintiffs’ Motion to Compel the Production of Certain Documents and Consent Motion for an Extension of Time</li> <li>May 26, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant Schering–Plough (<i>Note: withdrawal applies only to Schering-Plough</i>)</li> <li>May 27, 2004 – Consent Motion for an Extension of Time to Oppose the Motion to Compel</li> <li>May 27, 2004 – Opposition of the Together Rx Defendants to Plaintiffs’ Motion to Compel the Production of Documents</li> <li>May 28, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant Abbott Laboratories (<i>Note: withdrawal applies only to Abbott Laboratories</i>)</li> <li>June 8, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant AstraZeneca. (<i>Note: withdrawal applies only to AstraZeneca</i>)</li> <li>June 9, 2004 – Plaintiffs’ Reply Memorandum in Support of Motion to Compel the Production of Documents Created During the Relevant Time Period from the Together Rx Defendants</li> <li>June 22, 2004 – Order granting Plaintiffs’ Motion to Withdraw Motion to Compel Directed at Abbott Laboratories</li> <li>Awaiting scheduling of hearing or ruling by Court as to Together Rx Defendants</li> </ul> </li> <li>February 23, 2005 – <b>Third Party Schaller Anderson Inc.’s Objection and Motion to Quash Plaintiffs’ Subpoena</b></li> <li>June 14, 2005 – <b>Defendant Sicor Inc. and Sicor Pharmaceuticals, Inc.’s Motion for Protective Order with Memorandum in Support <i>sub judice</i></b> (Magistrate Judge Bowler)</li> </ul>

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<ul style="list-style-type: none"> <li>○ June 28, 2005 – Plaintiffs’ Response to Sicor’s Motion for Protective Order</li> <li>○ July 7, 2005 – <b>Motion for Leave to File Reply to Plaintiffs’ Response to Sicor’s Motion for Protective Order</b></li> <li>• November 9, 2005 – <b>Plaintiffs’ Motion for Order Exempting Defendant Abbott Laboratories from Any Order Refusing to Extend Deadline for Track Two Discovery</b> <ul style="list-style-type: none"> <li>○ November 23, 2005 – Defendant Abbott Laboratories’ Opposition to Plaintiffs’ Motion for Order Exempting Defendant Abbott Laboratories from Any Order Declining to Extend Deadline for Track Two Discovery</li> <li>○ December 1, 2005 – Plaintiffs’ Letter to Magistrate Judge Bowler Requesting Postponement of Hearing until Track Two Discovery Issues Resolved</li> </ul> </li> <li>• November 28, 2005 – <b>Plaintiffs’ Motion for Clarification of Case Management Order #16</b> <ul style="list-style-type: none"> <li>○ November 30, 2005 – Response of Defendant Watson Pharma, Inc. to Plaintiffs’ “Motion for Clarification of Case Management Order #16”</li> <li>○ November 30, 2005 – Certain Track II Defendants’ Request for Expedited Hearing</li> <li>○ December 1, 2005 – Order re: Plaintiffs’ Motion for Clarification of Case Management Order #16</li> <li>○ December 9, 2005 – Track II Defendants’ Submission Regarding Discovery Schedule</li> <li>○ December 9, 2005 – Watson Pharmaceuticals, Inc.’s Response to Court Order Regarding Discovery Schedule</li> <li>○ December 9, 2005 – Defendants Baxter Healthcare Corporation and Baxter International Inc.’s Memorandum Regarding Track II Discovery Schedule</li> <li>○ December 9, 2005 – Plaintiffs’ Memorandum in Support of Their Proposed Track II Discovery Schedule</li> <li>○ December 15, 2005 – Plaintiffs’ Reply to Watson Pharmaceuticals, Inc.’s Response to Court Order Regarding Discovery Schedule</li> <li>○ December 16, 2005 – Watson Pharmaceuticals, Inc.’s Motion for Leave to File Reply Memorandum in Support of Its Response to Court Order Regarding Discovery Schedule</li> </ul> </li> </ul>

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
<b>Master Consolidated Class Action (continued)</b>			<ul style="list-style-type: none"> <li>• January 18, 2006 – <b>Plaintiffs’ Motion to Compel Third-Party AmeriSource Bergen Corp. to Produce Deponent(s) Pursuant to Fed. R. Civ. P. 30(B)(6) and Fed. R. Civ. P. 45</b> <ul style="list-style-type: none"> <li>○ January 18, 2006 – Plaintiffs’ Motion for Leave to File Under Seal Memorandum in Support of Their Motion to Compel Third-Party AmeriSource Bergen Corporation to Produce Deponent(s) Pursuant to Fed. R. Civ. P. 30(B)(6) and Fed. R. Civ. P. 45 Under Seal</li> </ul> </li> <li>• February 16, 2006 – <b>Dey, Inc.’s and Abbott Laboratories’ Objections to the Order of Chief Magistrate Judge Bowler Issued on February 4, 2006 Pursuant to Fed. R. Civ. P. Rule 72(a)</b> <ul style="list-style-type: none"> <li>○ February 22, 2006 – Plaintiffs’ Assented-to Motion for Leave to Reply to Dey, Inc.’s and Abbott Laboratories’ Objections to the Order of Chief Magistrate Judge Bowler Issued on February 4, 2006 to File Such Reply Until March 8, 2006</li> </ul> </li> <li>• February 21, 2006 – <b>UnitedHealthcare, Inc. and United HealthCare Insurance Company’s Limited Objections to Magistrate Judge’s Order Granting Defendants’ Motion to Compel</b></li> <li>• February 27, 2006 – <b>Plaintiffs’ Second Motion to Compel Production by Amgen, Inc., with Request for Expedited Briefing and Disposition</b></li> <li>• February 27, 2006 – <b>Johnson &amp; Johnson Defendants’ Motion for a Protective Order Respecting Non-Party Deponents</b></li> <li>• February 28, 2006 – <b>Track Two Defendants’ Motion to Compel Plaintiff Blue Cross Blue Shield of Massachusetts, Inc. and Third-Party National Heritage Insurance Company in Their Capacities as the Medicare Part B Carriers for Massachusetts to Produce Documents and Witnesses for Deposition Pursuant to Subpoena</b></li> </ul>
<b>International Union of Operating Engineers, Local No. 68 Welfare Fund v. AstraZeneca PLC et al.</b>	04-11503-PBS	Removed to D.N.J.	<ul style="list-style-type: none"> <li>• <b>Motion to Remand</b> filed in District of New Jersey prior to transfer; briefed while pending in District of New Jersey <ul style="list-style-type: none"> <li>○ April 22, 2005 – Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund</li> <li>○ May 3, 2005 – Rejection of Supplemental Brief in Support of</li> </ul> </li> </ul>

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
<b>International Union of Operating Engineers, Local No. 68 Welfare Fund v. AstraZeneca PLC et al</b> (continued)			<p>Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund</p> <ul style="list-style-type: none"> <li>○ May 6, 2005 – Supplemental Brief in Opposition to Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund due to be filed</li> <li>○ June 1, 2005 – Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund re-filed</li> <li>○ July 20, 2005 – Notice of Supplemental Authority</li> <li>○ August 19, 2005 – Memorandum and Order: AstraZeneca Shall Submit an Affidavit Explaining Factual Basis for Statement in Notice of Removal within 30 days; and All Discovery on Fraudulent Joinder Claims Shall be Completed within 60 days</li> <li>○ September 19, 2005 – Response of AstraZeneca Pharmaceuticals LP (Attaching Declaration of Scott Wise with Exhibits) Filed in Response to Court Order Dated August 19, 2005</li> <li>○ September 29, 2005 – Motion by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund for Immediate Remand Based Upon Declarations of Defense Counsel or, in the Alternative, Motion to Reconsider Memorandum and Order of August 19, 2005</li> <li>○ October 12, 2005 – Memorandum of Law in Opposition to Motion by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund for Immediate Remand Based Upon Declarations of Defense Counsel or, in the Alternative, Motion to Reconsider Memorandum and Order of August 19, 2005</li> <li>○ December 28, 2005 – AstraZeneca Pharmaceutical's Second Supplemental Memorandum of Law in Opposition to Motion for Remand by Plaintiff International Union of Operating Engineers, Local No. 68 Welfare Fund</li> <li>○ January 24, 2006 – Opposition by Local 68 to Defendants' Second Supplemental Memorandum of Law in Opposition to Remand</li> <li>○ February 10, 2006 – Supplemental Brief in Support of Remand by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund, Per Court's Directive of January 27, 2006</li> <li>○ February 10, 2006 – Motion to File Under Seal Affidavit of Donald E. Haviland, Jr. in Support of Supplemental Brief in Support of Remand by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund, in Response to Court's Directives of</li> </ul>

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
<b>International Union of Operating Engineers, Local No. 68 Welfare Fund v. AstraZeneca PLC et al</b> (continued)			<p>January 27, 2006, and in Response to Order of February 2, 2006 and Exhibits Thereto</p> <ul style="list-style-type: none"> <li>○ February 10, 2006 – AstraZeneca Pharmaceutical LP's Memorandum of Law Pursuant to the Court's Directive on January 27 and in Opposition to Motion for Remand by Plaintiff International Union of Operation Engineers, Local No. 68 Welfare Fund</li> <li>• October 28, 2005 – <b>Notice of Voluntary Dismissal of Lupron Related Claims with Prejudice by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund</b></li> <li>• January 30, 2006 – <b>AstraZeneca's Notice of Proposed Order Pursuant to the Court's January 27, 2006 Rulings</b> <ul style="list-style-type: none"> <li>○ January 31, 2006 – Notice of Opposition to Proposed Order Presented by AstraZeneca Pharmaceuticals LP Respecting the Court's January 27, 2006 Rulings, and Submission of Alternative Form of Order</li> <li>○ January 31, 2006 – Statement Regarding Plaintiff's Opposition to Form of Order Submitted by AstraZeneca Pursuant to the Court's January 27, 2006 Rulings</li> </ul> </li> </ul>
<b>Government Employees Hospital Association v. Serono International, S.A. et al</b>	05-11935-NMG	D. Mass.	<ul style="list-style-type: none"> <li>• September 23, 2005 – Class Action Complaint filed               <ul style="list-style-type: none"> <li>○ November 21, 2005 – First Amended Class Action Complaint Filed Against Serono International, S.A., Serono Laboratories, Inc., Serono, Inc., RJI Systems, Inc., and Rudolph J. Liedtke</li> <li>○ February 3, 2006 – Serono Labs' Response to the Amended Complaint due</li> <li>○ March 17, 2006 – Plaintiffs' Opposition to Responsive Motion due</li> <li>○ April 6, 2006 – Serono Labs' Reply to Opposition due</li> </ul> </li> <li>• October 31, 2005 – Order case consolidated with 01-cv-12257</li> <li>• February 22, 2006 – Serono Defendants' Consent to Plaintiff's Request to File Second Amended Complaint and Joint Motion for Entry of the Parties' Agree-Upon Schedule for Response</li> </ul>